

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**J.R. INSULATION SALES  
& SERVICE, INC.**

CASE NO.: 03-02050 (GAC)

CHAPTER 11

**MOTION REQUESTING ACTION AND/OR UPDATE  
FROM DEBTOR IN REGARDS TO SECOND  
AMENDED PLAN UNDER CH. 11**

**TO THE HONORABLE COURT:**

**COMES NOW**, Banco Popular de Puerto Rico (hereinafter “BPPR”) herein through the undersigned attorney, and respectfully presents the following request:

1. The Second Amended Plan under Chapter 11 of the Bankruptcy Code was filed by the Debtor on March 28, 2006 (The “Amended Plan”).
2. This Honorable Court entered an order confirming the plan on October 18, 2006.
3. The Amended Plan provides that Class 1, 2, 3, 5 and 6 would be receiving the product of the sale of the following: (1) two properties located in Peñuelas, (2) a property located in Barceloneta, (3) inventory, and (4) equipment.
4. BPPR secured claims are classified as Class 1, 2, 3, 5 and 6 under the Amended Plan.
5. The sale of the inventory and the equipment should have been sold pursuant to the Amended Plan by December 24, 2008.
6. The sale of the real property should have been sold pursuant to the Amended Plan by February 26, 2009.
7. As of this date we have not received the product of the sale of the properties pursuant to the Amended Plan.

**WHEREFORE**, the parties respectfully this Honorable Court to request the Debtor to explain why the Amended Plan has not been consummated as proposed and what alternative does he proposes, and for any other order just and fair under the circumstances.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 26th day of August, 2009.

**CERTIFICATE OF SERVICE:** Today I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all creditors and other parties in interest which have filed a notice of appearance in the caption case.

/s/ *Rebeca Caquías Mejías*

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